

From: [REDACTED]
To: [Fisher, Mike](#)
Cc: [REDACTED]
Subject: Cooke Aquaculture Case Summary (CCRS)
Date: Sunday, January 28, 2018 6:19:23 PM

When we next chat could use your opinion – the summary remains the same:

On August 19, 2017, thousands of farmed Atlantic salmon were released into the waters between Anacortes and the San Juan Islands by the Cooke Aquaculture Fish Farm following the collapse of Net Pen #2 near Cypress Island, Washington. Cooke Aquaculture initially claimed that between 3,000-4,000 Atlantic Salmon were released due to excessive tides caused by the lunar eclipse. However, subsequent estimates indicated that the collapse released approximately 185,000 Atlantic Salmon into the Puget Sound.

Cooke Aquaculture is the largest producer of farmed Atlantic salmon in North America, with operations in Washington, Atlantic Canada and Maine, in addition to its salmon farms in Chile and Scotland. Cooke Aquaculture has a National Pollutant Discharge Elimination System (NPDES) permit issued by the Washington State Department of Ecology to raise and harvest Atlantic Salmon at three locations near Cypress Island. Among its terms, the permit requires weekly visual inspections and annual structural integrity inspections.

In February 2017, Cooke Aquaculture filed a Joint Aquatic Resource Permit Application (JARPA) with the Washington State Department of Fish and Wildlife (WDFW) for replacement of Net Pen #2, providing the following description for Net Pen #2: "The current condition of the existing fish pen structure can be described as 'used and nearing the end of serviceable life.' The existing steel net pen structure has been in service for approximately 16 years in the marine environment and is due for complete replacement. Corrosion on the metal walkway grating and substructures is beginning to accelerate. The metal hinge joints in some areas are showing signs of excess wear." Cooke Aquaculture further stated that Net Pen #2 received more pressure from tides than the other two net pens due to its location in Puget Sound: "Repositioning the floating pens is necessary to align the narrow ends of the farm to the prevailing currents at the site. This new orientation will substantially reduce the drag loads exerted on the fish containment nets, the mooring points and the net pen structure, and will improve the overall safety of the operation as well as the improve the cultivation environment for the reared fish stocks." However, Cooke Aquaculture continued to use the structure until its failure and the subsequent release of fish on August 20, 2017. This permit approval is still pending.

The initial investigation indicates that Cooke Aquaculture may have continued to use Net Pen #2 beyond its reasonable lifespan, considering the positioning of the aging structure in an area of extreme tides.

Regional Criminal Enforcement Counsel Karla Perrin [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Special Agent [REDACTED] has been in contact with NOAA OLE, the United States Attorney's Office, the Washington State Attorney General's Office and multiple state regulatory agencies regarding this direct discharge of materials to waters of the United States. The United States Attorney's Office in Seattle, Washington [REDACTED]
[REDACTED]

Thanks - [REDACTED]

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